

1 **MATTHEW T. GREGORY**

2 **Attorney at Law**

3 Second Floor, V.S. Sablan Building
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4 PMB 419, Box 10000
Saipan MP 96950
Telephone: (670) 234 3972
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FILED
Clerk
District Court

DEC 22 2005

5 For The Northern Mariana Islands
By _____
6 (Deputy Clerk.)

7 **LUJAN, UNPINGCO, AGUIGUI & PEREZ LLP**

8 **ATTORNEYS AT LAW**

9 Suite 300 Pacific News Building
238 Archbishop Flores Street
Hagåtña, Guam 96910
Telephone: (671) 477-8064/5
Facsimile: (671) 477-5297

10 *Attorneys for World Corporation*

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE
NORTHERN MARIANA ISLANDS

13 YU SUK CHUNG,) Civil Action No. 04-00001
14 Plaintiff,)
15 vs.) **DECLARATION OF**
16) **MATTHEW T. GREGORY IN**
17) **SUPPORT OF MOTION FOR COSTS**
18)
19) **DATE: FEB 16 2006**
20) **TIME: 8:30am**

21 I, Matthew T. Gregory, hereby declare as follows:

- 22 1. I am one of the attorneys of record for Defendant World Corporation in this case. I
make this declaration based on my personal knowledge and I am competent to testify
23 to the matters set forth herein.

2. Attached hereto as Exhibit "A" is a true and accurate copy of the Offer of Judgment served on Plaintiff on October 14, 2005.
 3. Attached hereto as Exhibit "B" is a true and accurate copy of Defendant's Certificate of Service for the October 14, 2005 Offer of Judgment.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Executed this 22nd day of December, 2005.

MATTHEW T. GREGORY

1 **MATTHEW T. GREGORY, ESQ.**

2 Attorney at Law

2 Second Floor, V.S. Sablan Building

3 Chalan Piao

3 PMB 419, Box 10000

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6 **DAVID J. LUJAN, ESQ.**

7 **IGNACIO C. AGUIGUI, ESQ.**

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10 Facsimile: (671) 477-5297

11 *Attorneys for Defendant World Corporation*

12 **IN THE UNITED STATES DISTRICT COURT**

13 **FOR THE**

14 **NORTHERN MARIANA ISLANDS**

17 YU SUK CHUNG,

18 Plaintiff,

19 vs.

20 WORLD CORPORATION,

21 Defendant.

17 CIVIL CASE NO. **04-00001**

18 **OFFER OF JUDGMENT**



1 **TO: PLAINTIFF AND HIS ATTORNEY OF RECORD:**

2
3 Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant hereby offers to
4 allow judgment to be taken against it in this action, in the amount of One Hundred Seventy Five
5 Thousand U.S. Dollars (\$175,000.00). It is explicitly stated that this Offer of \$175,000.00
6 includes costs and therefore, a judgment based on this Offer will not include any additional
7 amount for costs. *Marek v. Chesny*, 473 U.S. 1, 6, 87 L.ED 2d 1, 6, 105 S.Ct. 3012, 3015 (1985).

8 This Offer of Judgment is made for the purposes specified in Rule 68 and is not be
9 construed either as an admission that the Defendants are liable in this action, or that the Plaintiff
10 has suffered any damages.

11 DATED this 14th day of October, 2005.

12
13 **MATTHEW T. GREGORY, ESQ.**
14 **LUJAN UNPINGCO AGUIGUI & PEREZ LLP**

15 By: 

16 **MATTHEW T. GREGORY, ESQ.**
17 Attorneys for World Corporation

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10

11 **IN THE UNITED STATES DISTRICT COURT**
FOR THE
NORTHERN MARIANA ISLANDS

12

13 YU SUK CHUNG,) Civil Action No. 04-00001

14 Plaintiff,)

15 vs.)

16) **CERTIFICATE OF SERVICE**

17 WORLD CORPORATION,)

18 Defendant.)

19

20 I, Maricar M. Guintu certify that on October 14, 2005, a true and correct copy of the

21 Defendant's Offer of Judgment in this action was served via facsimile at 4:38 p.m. and hand
22 deliver at 5:15 p.m. to:



1 COLIN M. THOMPSON
2 Attorney at Law
3 J.E. Tenorio Building
4 Middle Road, Gualo Rai
5 PMB 917, Box 10001
6 Saipan, MP 96950

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8 Dated this 17th day of October, 2005.
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10 MARICAR M. GUINTU
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